

Our File No.: 27080

John R. Morton, Jr., Esq.
110 Marter Avenue
Suite 301
Moorestown, NJ 08057
(856)866-0100
Attorney for Ford Motor Credit Company, LLC
JM5630_____

UNITED STATES
BANKRUPTCY COURT FOR
THE DISTRICT OF NEW
JERSEY

IN RE:

MYRON K. DANIELS
JOYCE DANIELS

CHAPTER 13
CASE NO: 08-27502(DHS)

HEARING DATE:

NOTICE OF MOTION OF
FORD MOTOR CREDIT
COMPANY, LLC TO
MODIFY THE AUTOMATIC
STAY

To:

Myron and Joyce Daniels
663 W. Meadow Avenue
Rahway, NJ 07065
Debtor

Bruce W. Radowitz, Esq.
636 Chestnut Street
Union, NJ 07083
Attorney for the debtor

Marie-Ann Greenberg
Chapter 13 Standing Trustee
30 Two Bridges Road
Suite 330
Fairfield, NJ 07004
Trustee

John R. Morton, Jr., Esquire, attorney for Ford Motor Credit Company, LLC, has filed papers with the Court for relief from the automatic stay to permit Ford Motor Credit Company, LLC to repossess and sell the motor vehicle(s) described in the attached pleadings. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult with one.** If you do not want the Court to grant the relief sought, or if you want the Court to consider your views on the motion, then no later than seven (7) days before the hearing date, you or your attorney must:

File with the Court a written request for a hearing (or, if the Court requires a written response, an answer, explaining your position) at:

United States Bankruptcy Court
PO Box 1352
50 Walnut Street
Newark, NJ 07101-1352

If you mail your (request) (response) to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

John R. Morton, Jr., Esquire
110 Marter Avenue, Suite 301
Moorestown, NJ 08057

TAKE FURTHER NOTICE that the facts movant relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion, and TAKE FURTHER NOTICE that oral argument is hereby not requested.

Attend the hearing scheduled to be held on _____ at _____ a.m. in Courtroom _____, United States Bankruptcy Court, 50 Walnut Street, 3rd. Floor, Newark, New Jersey 07102.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order.

Date:

/s/ John R. Morton, Jr.
John R. Morton, Jr., Esquire
Attorney for Ford Motor Credit
Company, LLC